

To: Luke Chavez, Site Assessment Manager, EPA Region 8

From: Don Aragon, WREQC Director

RE: WREQC Comments on EPA's Site Investigation-Field Sampling Plan for the Pavillion Area Groundwater Plume (prepared by URS):

1. WREQC is concerned that only domestic wells will be sampled during the site characterization/(focused) Site Inspection activities. There are a number of monitoring wells identified on Figure 2 (the large map included with the URS document). WREQC feels that a subset of these monitoring wells be included in the sampling activities. The selection of monitoring wells for sample collection should be based on well characteristics such as depth, screening interval, and other relevant factors.
2. WREQC feels that the assumption that only the groundwater pathway exposure is viable may be incorrect (Section 4.3 and Figure 3). As Figure 3 indicates, there may be aquifer cross-contamination in semi-confined and unconfined or shallow/surficial aquifer(s). This cross-contamination could result in both soil and surface water exposure pathways of contaminants. Additionally, the location/depth of screened intervals in domestic well casings, compromised domestic well casings, and paleo-channels of Five Mile Creek could be acting as preferential or potential exposure pathways. As many of the domestic wells appear to under pressure (either artesian or very high static water levels in relation to well depths), the potential for percolation and cross-contamination of aquifers appears significant. In addition, these conditions may be conducive to contamination of surface water features such as springs and seeps within the incised stream reaches of Five Mile Creek and its tributaries.
3. WREQC is concerned that the soil exposure pathway was not considered because "the potential contamination source would be a plume that is greater than two feet below the ground surface." As stated above, WREQC feels the potential exposure pathways may include cross-contamination of the surficial aquifer; therefore, soil contamination should be considered a potential exposure pathway.
4. Section 4.3 lists several fish species found in Five Mile Creek and states that the species found there "are not typically eaten by humans." This statement is not correct, as the burbot (*Lota lota*) is one of the most sought after fish for consumption in the Wind River watershed. As noted above, WREQC feels there may be a surface water exposure pathway, which may affect the health

of humans consuming this species.